

# EXHIBIT 1



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March 2, 2021

**VIA ELECTRONIC MAIL AND FACSIMILE**

Chief Shelbert Williams

Dr. Dennis Graves

2001 Mill Rd.

Alexandria, VA 22314

[shelbert.williams@alexandriava.gov](mailto:shelbert.williams@alexandriava.gov)

[dennis.graves@alexandriava.gov](mailto:dennis.graves@alexandriava.gov)

**RE: Zackary Ellis Sanders**

Dear Chief Williams and Dr. Graves,

This letter is to follow up to previous correspondence and phone calls with Dr. Graves since February 19, 2021, and a voicemail to Chief Williams today, March 2, 2021.

We ask that Alexandria Detention Center (ADC) take immediate steps to arrange a specialist appointment with Mr. Sanders's treating long-term neurology specialist, Dr. Rahul Dave (the Director of Neuroimmunology & MS Center at the VCU College of Medicine), no later than March 5, 2021. Immediate action is required because Mr. Sanders may need urgent hospitalization and intravenous corticosteroids to treat his optic neuritis and avoid permanent vision loss or even total blindness.

As ADC is aware from previous correspondence, phone calls, and voicemails, Mr. Sanders suffers from "optic neuritis, a life and vision threatening condition that can lead to permanent blindness." Over the past couple of weeks, Mr. Sanders has experienced partial vision loss and mounting pressure behind his eyes. This is a sign of dangerous swelling and that he is in grave and immediate danger of permanently losing his vision.

As Dr. Dave explained in a letter provided to ADC on February 19, 2021, and re-attached here, because Mr. Sanders is "at high risk of losing vision and mobility" and suffering "permanent blindness," he has to be seen by Dr. Dave within 14 days of February 19, which is

no later than March 5, 2021. Life threatening and life-altering consequences are more likely when, as here, Mr. Sanders is not receiving proper treatment and management of his condition.

Despite being aware of the stakes and the urgency of the situation for at least the past 11 days, ADC has thus far refused to take the immediate action required to address the medical emergency Mr. Sanders is currently facing.

In order to schedule an appointment for Mr. Sanders with Dr. Dave, please call Emily Gamez at 571-472-4167 to make arrangements by March 5, 2021. As a reminder, and as described in Dr. Dave's letter, any appointment with Dr. Dave would follow strict COVID-19 protocols and require mask wearing at all times.

I can be reached at 202-271-9018 if you have any questions. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Jeffress', with a stylized, cursive script.

Jonathan Jeffress  
*Counsel for Zackary Ellis Sanders*

Enclosure: Letter from Dr. Rahul Dave

Name: Zackary E Sanders | DOB: [REDACTED] | MRN: [REDACTED] | PCP: PCP None, MD

## Letter Details



**Inova Medical Group Neurology Alexandria**  
1500 N BEAUREGARD STREET  
ALEXANDRIA VA 22311-1723  
Phone: 703-845-1500  
Fax: 703-845-1300

March 23, 2020

Zackary E Sanders  
[REDACTED]

Dear Sir or Madam:

Mr Zackary Sanders has had two hospital admissions in January for suspected Optic neuritis and is undergoing medical evaluation for causes, including multiple sclerosis. This is a high risk condition that can result in permanent blindness if not evaluated in a timely fashion. He will require regular followups with several subspecialists and has to undergo specialized testing. All of this will be impeded by jail time.

I appreciate any consideration you can offer for Mr Sanders. I can be reached as per below.

A handwritten signature in black ink, appearing to read 'Rahul Dave'.

Rahul Dave, MD PHD  
Director, Neuroimmunology & MS Center  
Inova Neurosciences Institute  
VCU College of Medicine (Fairfax campus)

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**EXHIBIT 2**